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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

April 20, 1995

SENT VIA FACSIMILE & CERTIFIED MAIL

Ms. Lisa Marie Price
Remedial Project Manager
Crystal Chemical Superfund Site
U.S. Environmental Protection Agency
Region 6, 6H-SC
Allied Bank Tower
1445 Ross Avenue
Dallas, TX 75202-2733

Re: Crystal Chemical Assessment of the Technical
Impracticability Ground-Water Remediation,
Crystal Chemical Site, Houston, Texas

Dear Lisa:

This letter serves to communicate Texas Natural Resource Conservation Commission (TNRCC) comments with regard to Southern Pacific Transportation Company's (SPTCo) ground-water technical impracticability (TI) waiver for a portion of the remedy as presented in the referenced document.

The information provided by SPTCo in the referenced document and in the supporting documentation does appear to support the TI waiver. However, the presentation of the TI waiver information in SPTCo's TI assessment document is difficult to follow. The TI assessment document references SPTCo's Soil and Ground-Water Model Report (SGWMR) numerous times. The assessment document would be easier to read and to comprehend if the SGWMR were incorporated as an appendix to the actual TI assessment document.

The TI assessment document states that it uses the United States Environmental Protection Agency's (EPA) September, 1993 interim final document entitled, "Guidance for Evaluating the Technical Impracticability of Ground-Water Restoration", as an outline for its own presentation and format. However, SPTCo's TI assessment document does not present all of the information required by the EPA guidance document. To wit, Section 4.3 of the EPA guidance document details the TI evaluation components that should be presented in TI assessment documents. Specifically, SPTCo's TI assessment document fails to adequately address the following items listed in the EPA guidance document:

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- 1) potential source control measures;
- 2) remedial action performance analysis (i.e., groundwater monitoring programs); and,
- 3) the presentation of other viable remedial alternatives for ground-water restoration.

Furthermore, the TNRCC letter to EPA Region 6, dated October 6, 1994, requested that, in any future documents requesting consideration of a ground-water TI waiver, SPTCo present

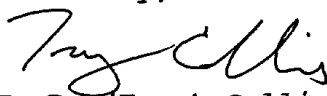
...any impracticabilities associated with removing the overbank deposits as an alternative to reaching the groundwater remedial action level; be established in any future document that requests consideration of a groundwater technical impracticability waiver.

The TI assessment document provided by SPTCo fails to adequately address this TNRCC request.

In summary, the TNRCC believes that SPTCo has the supporting data and documentation for a ground-water TI waiver at the Crystal Chemical Site. However, SPTCo's TI assessment document in its current form does not present the necessary information and data in a logical and acceptable manner that will support TNRCC concurrence for a ground-water TI waiver at the Crystal Chemical Site. In light of these comments, the TNRCC encourages SPTCo to revise and re-submit its TI assessment document to the TNRCC for review.

Please contact me with any questions concerning these comments or any other issues at the Crystal Chemical site at (512) 239-2030.

Sincerely,


E. R. (Trey) Collins, III
Project Manager
Superfund Engineering Section
Pollution Cleanup Division

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